

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

GILBERTO LUIS TORRES-
CARRASQUILLO

DEBTOR

CASE NO 15-04802 MCF

CHAPTER 13

**DEBTOR'S MOTION FOR EXTENSION OF TIME TO
COMPLY WITH ORDER ON ARREARS, DOCKET NO. 51**

TO THE HONORABLE COURT:

COMES NOW, **GILBERTO LUIS TORRES CARRASQUILLO**, debtor in the above captioned case, through the undersigned attorney, and very respectfully states and prays as follows:

1. On July 13, 2016, the Chapter 13 Trustee filed a motion requesting dismissal, docket entry #49, stating that the debtor was in arrears in the confirmed Plan payments in the sum of \$450.00, in the above captioned case.
2. On August 12, 2016, the debtor filed a reply to the Trustee's motion for dismissal and requesting additional time to cure the balance on the confirmed Plan arrears, docket entry #50.
3. On August 18, 2016, this Honorable Court granted debtor's request for additional time to cure the aforestated Plan arrears and issued an *Order On Arrears* (docket entry #51), whereby debtor was ordered to cure the Plan arrears within thirty (30) days or the case would be dismissed without further notice or hearing.

Page – 2-
Motion for Extension of Time
Case no. 15-04802 MCF13

4. The debtor respectfully informs this Honorable Court that he recently lost his job and is currently unemployed, thus, he is unable, at this moment, to cure the aforementioned confirmed Plan arrears, pursuant to this Court's *Order On Arrears*, docket entry #51.

5. However, the debtor will commence working in a new job within the next thirty (30) days and respectfully proposes to file a post-confirmation modified Plan and file amended Schedules "I" and "J", in order to reflect debtor's "change of circumstances", in the present case. The modified Plan to be filed by the debtor within the next thirty (30) days will provide for the Plan arrears as stated by the Trustee in his motion for dismissal, docket entries #49, 50 and 51.

6. Based on the aforementioned, the debtor needs additional time to commence working in a new job, inform the Court of debtor's "change of circumstances", file amended Schedules "I" and "J" and file a post-confirmation modified Plan in order to provide for the confirmed Plan arrears pursuant to the *Trustee's Motion to Dismiss*, docket no. 49.

7. Based on the aforementioned, the debtor needs an extension of time of thirty (30) days within to comply with this Honorable Court's *Order On Arrears*, docket no. 51, in the present case. **This extension of time to expire on October 19, 2016.**

WHEREFORE, debtor, through the undersigned attorney, respectfully requests that for the above stated reasons this Honorable Court grant the requested extension of time.

I CERTIFY that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF filing system which will send notice of same to: the Chapter 13

Page – 3-
Motion for Extension of Time
Case no. 15-04802 MCF13

Trustee, Jose R Carrion Morales, Esq.; I also certify that a copy of this motion was sent via US Mail to the debtor, Gilberto Luis Torres Carrasquillo, Condominio Vistas del Rio Box 59 Caguas PR 00727.

RESPECTFULLY SUBMITTED, in San Juan, Puerto Rico, this 19th day of September, 2016.

/s/Roberto Figueroa Carrasquillo
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